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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

DELPHI CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 05-44481 (RDD)

(Jointly Administered)

DELPHI CORPORATION, *et al.*,

Plaintiffs

Adv. Pro. No. 07-02236 (RDD)

- against -

DSSI and DSSI, LLC,

Defendants.

**JOINDER OF DSSI DEFENDANTS IN VARIOUS SUR-REPLIES AND
IN FURTHER SUPPORT OF ITS OBJECTION TO THE REORGANIZED
DEBTORS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINTS**

DSSI LLC and DSSI¹ (the “DSSI Defendants”), by and through their undersigned counsel, hereby join in the Sur-Replies filed by the following similarly situated defendants (the “Joinder”) to the reorganized debtors’ Motion for Leave to File Amended Complaints: (i) Johnson Controls, Johnson Controls Battery Group, and Johnson Controls, Inc. (Main Case No. 05-44481, Docket No. 21312); (ii) Methode Electronics, Inc. (Main Case No. 05-44481, Docket No. 21319); (iii) Ex-Cell-O Machine Tools, Inc. (Main Case No. 05-44481, Docket No. 21321); and (iv) Victory Packaging LP (Main Case No. 05-44481, Docket No. 21326) (collectively, the “Sur-Replies”). More particularly, the DSSI Defendants join in and adopt all relevant arguments and authorities set forth in the Sur-Replies, as well as in all other objections/sur-replies filed by similarly situated defendants, as if they were set forth herein in their entirety.

BACKGROUND

1. The Debtors filed an Adversary Proceeding against the DSSI Defendants under seal on September 28, 2007, and only served same upon the DSSI Defendants on or about March 22, 2010.

2. On May 14, 2010, the DSSI Defendants filed the Motion Of The DSSI Defendants Seeking An Order (i) Pursuant To Fed. R. Civ. P. 60 And Fed. R. Bankr. P. 9024, Vacating Prior Orders Establishing Procedures For Certain Adversary Proceedings, Including Those Commenced By Delphi Corporation, Et Al. Under 11 U.S.C. §§ 541, 544, 545, 547, 548, And/Or 549, And Extending The Time To Serve Process For Such Adversary Proceedings; And (ii) Dismissing The Adversary Proceeding With Prejudice Pursuant To Fed. R. Civ. P. 12(B) And Fed. R. Bankr. P. 7012(B). (Main Case No. 05-44481, Docket No. 20110.)

¹ In the Debtors’ preference action, the Debtors assert claims against a defendant styled “DSSI”. There is no entity known as DSSI in DSSI LLC’s corporate organization. Therefore, no response is necessary on behalf of this non-existent entity. “DSSI” is only referenced here to alert the Court to this issue and to prevent a default judgment being obtained against “DSSI” and efforts to assert any such judgment against DSSI LLC.

3. On September 7, 2010, DPH Holdings Corporation and certain of its affiliated reorganized debtors (the “Reorganized Debtors”) filed a Motion for Leave to File Amended Complaints (the “Motion to Amend”).

4. On November 24, 2010, the DSSI Defendants filed an objection to the Motion to Amend as filed with respect to them. (Main Case No. 05-44481, Docket No. 20940.)

5. On January 28, 2011, the Reorganized Debtors filed an Omnibus Reply in Further Support of the Motion.

JOINDER IN SUR-REPLIES

6. In the interest of judicial economy, the DSSI Defendants will not repeat and restate the arguments advanced by similarly situated parties who have filed Sur-Replies to the Motion to Amend. Rather, and as noted hereinabove, the DSSI Defendants join in and adopt all relevant arguments and authorities set forth in the Sur-Replies, as well as in all other objections filed by similarly situated defendants, as if they were set forth herein in their entirety. The DSSI Defendants further reserve their right to supplement this Joinder (and Sur-Reply), including but not limited to providing documentary evidence, and to appear at any and all hearings and conferences scheduled with respect to the Motion to Amend.

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CONCLUSION

WHEREFORE, and for the reasons set forth hereinabove and in the Sur-Replies, the DSSI Defendants respectfully request that this Court enter an Order: (i) denying the Motion to Amend with prejudice; and (ii) granting such other and further relief as the Court deems necessary and appropriate.

Dated: June 16, 2011
Roseland, NJ

FOX ROTHSCHILD LLP

By: /s/ Richard M. Meth

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